

EXHIBIT A

SUPREME COURT OF THE STATE OF NEW YORK
COUNTY OF QUEENS

BERNADETTA KLIMASZEWSKA

Plaintiff(s)

-Against-

TARGET CORPORATION

Defendant (s),

Index #

**SUMMONS WITH
VERIFIED COMPLAINT**

Plaintiff(s) designate Queens
County as the place of trial

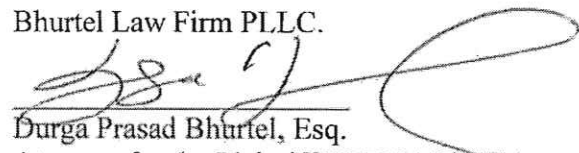
To the above-named Defendant(s):

You are hereby summoned to answer the complaint in this action, and to serve a copy of your answer, or, if the complaint is not served with this summons, to serve a notice of appearance on the plaintiff's attorneys within twenty days after the service of this summons, exclusive of the day of service, where service is made by delivery upon you personally within the state, or, within 30 days after completion of service where service is made in any other manner. In case of your failure to appear or answer, judgment will be taken against you by default for the relief demanded in the complaint.

Dated Queens, New York

December 23, 2019

Bhurtel Law Firm PLLC.


Durga Prasad Bhurtel, Esq.

Attorney for the Plaintiff BERNADETTA
KLIMASZEWSKA

3749 75th street Floor 2nd,
Jackson Heights NY 11372
718-509-6181

Date filed Summons:

The basis of the venue is the Place of Accident took place at 8801 Queens Boulevard, City of Elmhurst, County of Queens, State of New York.

SUPREME COURT OF THE STATE OF NEW YORK
COUNTY OF QUEENS

BERNADETTA KLIMASZEWSKA

Plaintiff(s)

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VERIFIED COMPLAINT

Plaintiff, BERNADETTA KLIMASZEWSKA by her attorney Bhurtel Law Firm PLLC., complaining of the defendant, respectfully allege the following upon information and belief as follows:

1. That at all the times hereinafter mentioned, plaintiff was and still is a resident of the County of Nassau, City and State of New York.
2. That at all the times hereinafter mentioned, the defendant(s) TARGET CORPORATION (hereinafter "Defendant" or "TARGET" was and still are a residence of the County of Queens, State of New York.
3. That at all the times hereinafter mentioned, the defendant (s) TARGET was and is domestic corporation.
4. That at all the times hereinafter mentioned, the defendant TARGET was and is Domestic Limited Partnership.
5. That at all the times hereinafter mentioned, the defendant TARGET was and is domestic Limited liability corporation.

6. That at all the times hereinafter mentioned, the defendant TARGET was and is doing business at county of Queens and State of New York.
7. That at all the times hereinafter mentioned, the defendant TARGET was/were the owners of certain lands and premises thereon known as 8801 Queens Boulevard, City of Elmhurst, County of Queens, State of New York, Zip Code 11373. (Herein this complaint referred as commercial premises).
8. That at all the times hereinafter mentioned, the defendant TARGET was/were the tenants of the certain lands and premises thereon known as 8801 Queens Boulevard, City of Elmhurst, County of Queens, State of New York, Zip Code 11373.
9. That at all the times hereinafter mentioned, the defendant TARGET and or its agents, servants and employees managed the aforesaid land premises thereon as the commercial premises.
10. That at all times hereinafter mentioned, the defendant TARGET and or its agents, servants and employees maintained the aforesaid commercial premises.
11. That at all times hereinafter mentioned, the defendant and or its agents, servants and employees controlled the aforesaid commercial premises.
12. That at all times hereinafter mentioned, the defendant and or its agents, servants and employees occupied and/or had possession of the aforesaid commercial premises.

13. That at all the times hereinafter mentioned, the defendant TARGET and or its agents, servants and employees negligently managed the aforesaid land premises thereon as the commercial premises.
14. That at all times hereinafter mentioned, the defendant TARGET and or its agents, servants and employees negligently maintained the aforesaid commercial premises.
15. That at all times hereinafter mentioned, the defendant and or its agents, servants and employees negligently controlled the aforesaid commercial premises.
16. That at all times hereinafter mentioned, the defendant and or its agents, servants and employees negligently occupied and/or had possession of the aforesaid commercial premises.
17. That at all times hereinafter mentioned, the defendant and or its agents, servants and employees negligently display Furniture, goods things for the purpose of sale.
18. That at all relevant times, the store located at 8801 Queens Boulevard, City of Elmhurst, County of Queens, State of New York, was and is a supermarket and/or business store where the defendants invite the general public, including the plaintiff.
19. That at all relevant times on the 28th day of October 2017, and for some time prior thereto, the defendant, their agents, servants and/or employees created,

caused, permitted and allowed inside the store at premises to be, become and remain in a dangerous condition and/or hazardous condition and/or created such hazardous and/or dangerous condition and/or causing it to come off the furniture, box, and/or materials.

20. That at all relevant times on October 28, 2017 subject furniture, box, bookshelves and/or material suddenly fell off from display area and struck plaintiff.
21. The limitations on liability set forth in C.P.L.R. Article 16 do not apply herein and one or more of the exemptions set forth in C.P.L.R. §1602 applies.
22. The defendants negligently failed to properly inspect, and maintain the premises and/or its business, causing a dangerous and hazardous condition to exist on its premises and/or business.
23. Fall of the furniture, box, goods, or things was caused solely by the negligence of the defendant as aforesaid and without any negligence on the part of the plaintiff contributing thereon in any manner or degree whatsoever.
24. That due to the aforesaid accident Plaintiff sustained injuries to her various part of her body and limbs and permanent residuals such as impairment of motion of body part, organ or system, with continuous pain and stiffness was injured both internally and externally was compelled to seek and secure medical care for the treatment of her injuries.

25. That as a result of the foregoing, plaintiff has been damaged in a sum, which exceeds the jurisdictional limits of the lower courts in the State of New York.
26. By reason of the foregoing, the plaintiff was injured, all to her damage in an amount that exceeds the jurisdictional limits of all lower courts that would otherwise have jurisdiction over this action.

WHEREFORE, the plaintiff's demands judgment against the defendants, jointly and severally for each cause of action in the sum exceeding jurisdictional limits of all lower court's in the State of New York with the interest thereon, costs and disbursements of the within action for each cause of action.

Dated: Jackson Heights, New York
December 23, 2019

Your Etc.
Bhurtel Law Firm PLLC



Durga Prasad Bhurtel, Esq.
Attorney for the Plaintiff
37-49 75th Street, 2nd floor,
Jackson Heights NY 11372
718-509-6181

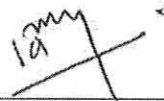
VERIFICATION

STATE OF NEW YORK)
) ss:
COUNTY OF QUEENS)

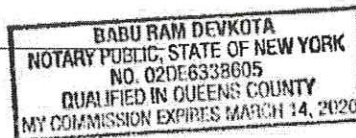
I, BERNADETTA KLIMASZEWSKA, being duly sworn, state that I am the plaintiff in this action and I have read and Verified Complaint and know the contents thereof; the same are true to my knowledge, except as to those matters alleged on information and belief, and as to those matters I believe them to be true.


Bernadetta Klimaszewska

Subscribed and sworn before me on
this 23rd day of December 2019



Notary Public



SUPREME COURT OF THE STATE OF NEW YORK
COUNTY OF QUEENS

BERNADETTA KLIMASZEWSKA	Index No.
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Against	#
TARGET CORPORATION	
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SUMMONS WITH VERIFIED COMPLAINT

Durga Prasad Bhurtel, Esq.
Attorney for Plaintiff(s)

Office and Post office Address, Telephone

**Bhurtel Law Firm PLLC
3749 75th Street Floor 2nd,
Jackson Heights New York 11372
7185096181**

To :
Attorney(s) for Respondent

Service of a copy of the within is hereby admitted
Dated,

Attorney(s) for